

### **REMARKS**

Claims 1-2, 6-9, 11-13 and 18 are pending in the present application, claims 3-5, 10, and 14-17 having been cancelled herein without prejudice or disclaimer. The Office Action and cited references have been considered. Favorable reconsideration is respectfully requested.

Claims 1-3, 5-7 and 14-18 are rejected under 35 U.S.C. §102(b) as being anticipated by Conley (U.S. Patent Application Publication No. 2002/0099904). Claims 4, 8-9, and 12-13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Conley in view of Estakhri et al. (U.S. Patent No. 5,930,815). Claims 10-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Conley in view of Asnaashari (U.S. Patent No. 5,928,370). These rejections are respectfully traversed for the following reasons.

Claim 1 recites a method for writing memory sectors in individually-deletable memory blocks (SB), comprising a number of memory sectors, whereby access to the physical sectors is achieved by means of an allocation table (ZT) for address conversion of a logical address (LA) into a physical block address (RBA) and a physical sector address (RSA), and whereby when a sector write command is to be carried out, which relates to an already written sector, the writing takes place to an alternative memory block (AB) by means of an altered address conversion, wherein the writing processes for sectors are carried out one by one to adjacent sectors of the alternative memory block (AB) and the position of the relevant sector in the alternative block (AB) is stored in a sector table. The sector table is organized as a search table (ST), each table

entry of which indicates the physical sector address (RSA) with a corresponding valid sector position in the alternative block (AB). This is not taught, disclosed or made obvious by the prior art of record.

Applicant respectfully submits that Conley does not teach the method of the present application. Conley describes a method to program a non-volatile memory. If a page of data in a physical block has to be written a second time, this page is written into a new block and an index table (the table of Fig. 12) is maintained, which indicates the position of the actual pages in the old or the new block. If the data of the block has to be read, all pages of the block are read in the reverse order into a buffer in RAM using the index table to determine the actual pages. This method requires a buffer in RAM which has at least the size of a memory block of the non-volatile memory. This large buffer in RAM is costly.

In contrast, The present application is related to flash memory devices, which are organized in blocks and these blocks are organized into sectors, where the sectors are writable individually into erased memory cells. The blocks are individually erasable, but not the sectors. If a sector has to be written a second time, this has to be done in another block. The sector table is organized as a search table (ST), each table entry of which indicates the physical sector address (RSA) with a corresponding valid sector position in the alternative block (AB).

Applicant respectfully submits that Conley does not disclose a search table to find the valid sectors of a multiple written memory block. Conley uses only an index table. Fig. 12 of Conley shows only an index table, as it is organized in sequence of the page numbers and all page numbers are referenced. In Conley, with a given logical page number,

the table shows the valid physical page number. Thus, the table of Figure 12 is used as an index table, not a search table. For at least these reasons, Applicant respectfully submits that claim 1 is patentable over the prior art of record.

Claims 2 -17 depend from an included recitation of claim 1. Applicant respectfully submits these claims are patentable of and of themselves, and at least for the reasons discussed above with respect to claim 1. Claim 18 is believed to be patentable at least for the reasons discussed above with respect to claim 1.

In view of the above amendments and remarks, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections of record. Applicant submits that the application is in condition for allowance and early notice to this effect is most earnestly solicited.

If the Examiner has any questions, he is invited to contact the undersigned at 202-628-5197.

Respectfully submitted,

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